

EXHIBIT 15

said they told him that I must not be his real mother because he is black. T.R. continued to come home in tears every other school day. I reported the ongoing harassment to T.R.'s teacher and the school principal. But the principal told me that he did not believe there was "any racism going on" and did not take steps to fix the problem.

5. The harassment got worse the next fall. T.R. told me the same kids bullied him with racial language almost every day and pushed and shoved him during recess. In October 2022, the same four boys attacked T.R. and stomped on his head. T.R.'s teachers found him "in the fetal position and crying," according to school records. As far as I know, the school did not discipline T.R.'s attackers. The school did not even inform me about the incident when it happened. I only learned about it when I obtained T.R.'s school records more than six months later.

6. T.R. and I repeatedly reported the ongoing harassment to teachers and school administrators, including the school assistant principal. But they dismissed the harassment as "boys being boys." Sometimes, the boys were taken to the office to discuss their behavior, then sent back to class. But to my knowledge, the school did not treat the abuse as racial harassment or try to teach the students about the race-based nature of their words and actions. Instead, I understand that when the school guidance counselor discussed the abuse with the boys, he cast it as mutual bullying and made T.R. apologize to the bullies, and when T.R. asked a teacher for help because he was being harassed at recess, the teacher scolded him for "tattling."

7. The boys continued to harass T.R. almost every day throughout the 2022 to 2023 school year. And in mid-April 2023, students in the same group called T.R. the N-word three days in a row. But when T.R. first reported it to school staff, they did not believe him. Although the school ultimately gave two of the students one-day in school suspensions, they were still allowed

to go to recess and interact with T.R. the next day, when they bragged in the hall to other students (including T.R.) about calling T.R. the N word and getting away with it.

8. So the harassment continued. On the same day, May 15, 2023, another student called T.R. the N word. T.R. told me that when he reported it to the assistant principal, she again told T.R. she did not believe him. The student later admitted that he called T.R. the N word, and he was also given a one-day in school suspension but was still allowed to go to recess and interact with T.R. the next day. Two days later, on May 17, 2023, one of the boys who had called T.R. the N word threatened to attack him after school. Although he received a one-day suspension, he tried to attack T.R. the next day. A group of bystanders had to intervene to stop him.

9. My son became depressed and constantly anxious because of the ongoing harassment and because he felt there was no one at school he could turn to for help. In June 2023, I elevated the issue to the school district superintendent, but despite multiple conversations, the school district dismissed my request to train teachers about how to respond to racial harassment and offered no plan to ensure that T.R. could safely attend school the following year. On June 12, 2023, the superintendent wrote that he would “no longer discuss the matter” with me.

10. Because T.R. was afraid to return to school and I did not believe the school district would protect him, I felt that I had no choice but to withdraw him from public school and enroll him in a local private school. To send T.R. to the private school, we have had to pay thousands of dollars in tuition and fees, as well as costs for T.R.’s school uniforms every year. If we need to continue to send T.R. to private school, those costs will only increase.

11. The harassment my son experienced has changed his life. He has had recurring nightmares about the harassment. For many months after I withdrew him from school, he experienced heart palpitations, chest pain, nausea, dizziness, and sometimes threw up when

seemingly trivial events triggered memories of his experience at FCPS—when adults raised their voice around him, when he sensed confrontation with other students, or when the topic of race was raised. Once a happy 11-year-old boy who loved school, T.R. has become socially withdrawn, school avoidant, and has made heart-breaking comments like “my heart can’t take this anymore.” Every two weeks, I drive T.R. two hours each way to therapy appointments in Omaha, where T.R.’s therapist has diagnosed him with post-traumatic stress disorder, depression, and anxiety disorders that the therapist attributes to T.R.’s experiences in school.

12. On June 20, 2023, I filed a complaint that was sent to the United States Department of Education’s Office for Civil Rights (“OCR”). My lawyers sent a letter to OCR to provide more detail about the complaint on August 21, 2023.

13. On December 7, 2023, OCR sent me a letter stating that it had opened an investigation into “[w]hether the Falls City Public Schools failed to respond in a reasonable, timely, and effective manner to notice of a hostile environment based on [T.R.’s] race, in violation of Title VI and its implementing regulation at 34 C.F.R. § 100.3.” I understand that the complaint is being handled by OCR’s Kansas City Office, which handles complaints from Nebraska.

14. On February 24, 2025, my attorney asked the OCR investigator assigned to the case for an update on the status of the investigation. On March 12, 2025, the investigator responded that the case was “still under investigation,” but noted that the Department of Education had just announced a reduction in force, and that she did “not have information as to how this announcement will affect processing and case assignments going forward.”

15. I have not heard anything from OCR since then.

16. I was devastated to hear the news of the reduction in force at OCR because I was depending on OCR to help my family and to help make Falls City schools safe for other black

students who are also struggling with racism. I filed a complaint with OCR because I felt that I had nowhere else to turn for help. My family is struggling to pay the costs to send T.R. to private school. If OCR got the school district to commit to taking effective steps to fix the hostile environment in Falls City Public Schools, I would consider sending T.R. back to public school. But without OCR's intervention, I will need to keep T.R. in private school next year.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 2, 2025.

A handwritten signature in black ink, appearing to read "Tara Blunt", is positioned above a horizontal blue line.

Tara Blunt